

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA)
)
)
v.) CASE NO.: 3:20-cr-00839-MAS
)
)
MOHAMAD MUSTAFA)

NOTICE OF A POTENTIAL FUTURE MOTION

MOHAMAD MUSTAFA, through counsel, submits this Notice of A Potential Future Motion, respectfully notifying the Court of the following:

Earlier today, on behalf of Mr. Mustafa, the undersigned filed a number of motions on Mr. Mustafa's behalf, in compliance with this Court's previous Order directing the defense to file all pretrial motions pursuant to Federal Rules of Criminal Procedure 12(b)(3) and 41(h) on or before March 6, 2023. Presently, the parties are working through a number of other issues that may obviate the need to file additional pretrial motions pursuant to Federal Rules of Criminal Procedure 12(b)(3) and 41(h). More specifically, in connection with its investigation and prosecution of Mr. Mustafa and others, the Government utilized a search warrant to obtain emails of Mr. Mustafa and others. However, late last week, the parties engaged in discussions that may make it unnecessary for the defense to challenge the warrant at issue. As it stands now, however, the parties need additional time to confer to continue to discuss the issues related to the warrant. Nonetheless, out of an abundance of caution, defense counsel files this Notice of A Potential Future Motion, respectfully notifying the Court

that at some point in the near future, defense counsel may need to file a Motion to Suppress Evidence related to the emails and other items referenced herein.

Respectfully submitted this 6th day of March, 2023.

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CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of the foregoing filing into this District's ECF System, which will automatically forward a copy to counsel of record in this matter.

Dated: This 6th day of March, 2023.

/s/ W. Carl Lietz, III
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